

SHER TREMONTE LLP

September 27, 2024

**VIA ECF**

Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

**Re:** *United States v. Rui-Siang Lin,*  
No. 24 Crim. 178 (CM)

Dear Judge McMahon:

I represent Rui-Siang Lin, the defendant in the above-referenced matter. I write to the Court to respectfully request permission to file *ex parte* and under seal a request for an exemption from the Protective Order. *See* ECF No. 11. To provide the basis for the requested exemption would reveal defense strategy and other information that cannot be disclosed to the government without compromising Mr. Lin's right to the effective assistance of counsel. Accordingly, I respectfully request permission to file the request *ex parte* and under seal. I am advised by the Clerk's Office that, should the Court grant this request, I should file the request in paper form in a sealed envelope. I will do so, unless the Court directs me to file it instead by fax, email or any other electronic means.

I appreciate the Court's consideration.

Respectfully submitted,

*/s/Noam Biale*  
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Noam Biale

*Attorney for Rui-Siang Lin*

cc: AUSA Ryan Finkel (by ECF)